

### **REMARKS**

Pending claims 34-37 and cancelled claims 38-40 are copies of claims 1-4 and 5-7, respectively, of U.S. Patent 6,947,067 to Halttunen, which patent issued on September 20, 2005, less than one year prior to this date. This application was filed on June 6, 2000, prior to the publication of the patent application which resulted in Halttunen Patent 6,947,067.

Applicants cancel claims 1-8, 10-11, 13-33 and 38-42 herein, and add new claims 43-50. Claims 34-37 and 43-50 are pending.

#### **Claim Rejections – 35 USC § 103**

The Examiner rejected claim 34 under 35 U.S.C. § 103 as being unpatentable over Heinonen (EP 804030 A2) (“Heinonen”) in view of Tran (“U.S. Patent 6,202,060”) (“Tran”).

The Examiner stated that Heinonen disclosed all of the limitations of claim 34, except for the use of the Bluetooth protocol to transmit the signal from the mobile phone. Respectfully, Applicants disagree with the Examiner’s analysis. Heinonen does not disclose the remaining limitations of claim 34.

Heinonen discloses a method to permit a user to carry out, e.g., banking transactions. In that method, the images of banking input forms displayed on the television are obtained from the video recorder, *not* from the mobile phone. See, for example, Heinonen, col. 5, lines 6-21 (“[t]he user has earlier obtained from his bank a video cassette which contains various blank forms in picture format”). In the Heinonen method, these images from the video cassette are displayed on the television so that the user may enter data into the forms. (See, e.g., Heinonen, page 1, para. 57 (“a video cassette which contains in picture format certain input forms, is inserted in the video tape recorder and an input form is displayed on the television screen”)) To be sure, Heinonen discloses that alternatively the blank forms *initially* may be transmitted through the telephone rather than provided on cassette. Heinonen, col. 6, lines 16-19. However, in the Heinonen method the blank forms initially received through the telephone are *not* then displayed on the television. Rather, Heinonen requires that they are transmitted “via the telephone system” only “so that the user is able to record them on video tape for *later* use.” Heinonen, col. 6, lines 18-20. (Emphasis added.) They

then may be displayed from the video recorder on the television at a *later* time for use. See Heinonen, col. 1, lines 54-57 (“the invention is also directed to a method ...in which an input form is read from a storage means and displayed to the user on a television screen”) Thus, contrary to the Examiner’s analysis, Heinonen col. 6, lines 16-20 does not disclose the claim 34 sequence of receiving image and sound data at the mobile phone, generating a signal from that data which is received at the module, converting the signal to image-sound signals at the module, *and connecting the signal to the television*. In Heinonen, col. 6, lines 16-20 input forms received in image and sound data via the telephone are sent not to the television but to the video recorder for storage. Claim 34 does not require the use of a video recorder to store the data received by the mobile phone.

(The other citations to Heinonen by the Examiner do not fill in this critical omission to disclose sending image and sound data received via the telephone to the television. These portions of Heinonen do not describe the connection from the module to the television of an image-sound signal formed by conversion in the module of a mobile phone output signal, which signal was generated in the phone from image and sound data received by the phone. Col. 3, lines 1-16 describe equipment, but no steps of any overall method of using the equipment; col. 3, lines 26-33 disclose the capability of the accessory to convert between mobile phone and TV-video recorder format, but again do not disclose any overall method of using the equipment in which the accessory is to do that; col. 3, line 42 to col. 4, line 20 describe the connection of the accessory to the television or video recorder and to the mobile telephone, and its internal structure and operation, but again no overall method of use; col. 4, lines 48-55 discloses a data adapter; and col. 6, lines 12-27 disclose the use of video cassettes or, as discussed above, the telephone to receive the input forms. Finally, figure 1 discloses an interconnection of equipment, but no method of use of the equipment shown, and the method of claim 34 is not inherent in the interconnection of the equipment shown.)

Another reason why claim 34 is patentable over Heinonen in view of Tran. Examiner recognized that Heinonen “fails to disclose transmitting the signal ... in a format that conforms to a Bluetooth protocol.” For that limitation, the Examiner relied on U.S. Patent 6,202,060 to Tran. Respectfully, however, Applicants suggest that there is no motivation to combine Tran with Heinonen, and that Tran is not analogous art. Tran does not relate in any way to a display for

mobile telephones. Rather, Tran discloses using a television as a *portable computer* display. Its disclosure may not be combined with that of Heinonen without the improper use of hindsight. The prior art of record does not give even a hint that Heinonen and Tran should be combined in that fashion.

It is important in this connection to place the claimed subject matter in context. What Applicants have done is typical in the history of technological advance. Applicants' claim 34 makes a significant addition to mobile telephones' value as a communications mode. When Applicants invented the subject matter of claim 34, the mobile phone's importance had certainly been recognized, and so had the possibility of providing a display on the mobile phone for limited graphics. But Applicants addressed, and solved, the problem of extending the mobile phone's usefulness as an image-and-sound-communication device by providing a method for displaying image-and-sound data from the phone on a television without requiring, for example, the phone to be placed in a special adapter or the television and the phone to be physically connected, e.g., by a cable. They developed a more practical way of extending the limited display of the mobile phone without placing it in an adaptor or physically connecting it to the television.

The fruit of this recognition was the design that claim 34 defines, i.e., one in which the mobile phone uses Bluetooth—i.e., not physically connected and not necessarily line-of-sight—transmission of image and sound signals to a module that converts the phone signals to signals to drive a TV. By simply having the module (but not the phone) plugged into his TV set, a mobile phone user can employ his phone to obtain, for example, big-screen video, without the need to keep the mobile phone out of his pocket.

The prior art of record does not disclose or suggest this combination. Certainly, Heinonen does not. Indeed, Heinonen teaches away from it: to interconnect the mobile phone 6 to the rest of his system, Heinonen installs it in an adapter 7 which in turn is physically connected by wire to the rest of his system. So Heinonen does not contain even a hint of a portion of the invention that claim 34 defines, i.e., having a mobile phone forward to a module by Bluetooth transmission image and sound the phone has received, so that the module can drive a TV, without the phone being placed in a special adaptor or physically wired to the system.

Nor does Tran fill in the gap. Tran describes using a wireless connection to employ a television set as a computer's monitor. True, once one has been informed of what Applicants recognized and has seen their solution, perhaps one could note *with hindsight* that Tran discloses wireless communication to a television for display. But nothing in Tran shows that Tan recognized the need that Applicants did, or solved the problem they solved. Tran did not conceive of having a mobile phone forward image and sound data it had received to a TV module by Bluetooth, and nothing external to Tran suggests looking to Tran to solve the problem Applicants addressed and solved.

In short, nothing in the prior art suggests combining Heinonen and Tran, much less using them to create Applicants' claim 34 method. For this additional reason as well, Applicants therefore request that the Examiner reconsider and allow claim 34.

Claims 35-37 depend from claim 34. Accordingly, insofar as claim 34 is allowable, so are claims 35-37.

### CONCLUSION

In view of the above remarks, Applicants believe pending Claims 34-37 and 43-50 are in condition for allowance.

Applicants invite the Examiner to contact the Applicants' Attorney if questions arise regarding this Response or if issues remain prior to allowance.

Respectfully submitted,

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